

RESPONSE DATE: January 23, 2019

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MOTION

COMES NOW, Michael G. Malaier, the Chapter 13 Trustee and alleges as follows:

1. Debtors filed this case on **December 21, 2015**. The case was confirmed by order of the Court on **April 27, 2016**.
2. Pursuant to the confirmed plan, Debtors are required to make plan payments of **\$1,823.08** Bi-weekly. Debtors are presently delinquent in plan payments in the amount of **\$2,636.59** and the plan is underfunded to complete in the remaining months allowed, supported by the Declaration filed herewith.
3. Debtors have defaulted under the terms of the Plan as follows: § 1307(c)(1) unreasonable delay by the debtor that is prejudicial to the creditors, § 1307(c)(6) failure to remit plan payments.

WHEREFORE the Trustee prays that this case be dismissed and closed.

DATED this 4th day of January, 2019 at Tacoma, Washington.

Mathew S. LaCroix

Mathew S. LaCroix, WSBA# 41847 for
Michael G. Malaier, Chapter 13 Trustee